

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DISTRICT**

In re:	)	Case No. 17-17361
	)	
RICHARD M. OSBORNE,	)	Chapter 7
	)	
Debtor.	)	Judge Arthur I. Harris

**SECOND STIPULATION GRANTING EXTENSION OF TIME TO RESPOND TO  
TRUSTEE'S MOTION FOR ENTRY OF AN ORDER AUTHORIZING AND APPROVING  
THE SURCHARGE OF COLLATERAL FOR THE ATTORNEYS' FEES AND COSTS  
INCURRED BY TRUSTEE FROM THE SALE PROCEEDS OF DEBTOR'S PROPERTY  
PURSUANT TO 11 U.S.C. § 506(c)**

Kari B. Coniglio (the "Trustee"), the chapter 7 trustee for the bankruptcy estate of Richard M. Osborne, The Huntington National Bank ("Huntington"), Diane M. Osborne ("DMO"), and Diane M. Osborne, Trustee of the Diane M. Osborne Trust ("DMO Trust"; and, together with DMO, collectively, the "DMO Parties") stipulate and agree that Huntington and the DMO Parties shall have a further extension of time, through and including March 31, 2021 to respond to the *Trustee's Motion for Entry of an Order Authorizing and Approving the Surcharge of Collateral for the Attorneys' Fees and Costs Incurred by the Trustee from the Sale Proceeds of Debtor's Property Pursuant to 11 U.S.C. §506(c)* [Doc. 1004] (the "Motion"). The parties further stipulate and agree that the hearing on the Motion may be adjourned to April 6, 2021 at 10:00 A.M. This is the second extension of time to respond.

Agreed to by:

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## **CERTIFICATE OF SERVICE**

I certify that on January 18, 2021, a true and correct copy of the *Second Stipulation Granting Extension of Time to Respond to Trustee's Motion for Entry of an Order Authorizing and Approving the Surcharge of Collateral for the Attorneys' Fees and Costs Incurred by the Trustee from the Sale Proceeds of Debtor's Property Pursuant to 11 U.S.C. §506(c)* was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

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